

Fill in this information to identify the case:Debtor 1 DWAYNE LEE CARRDebtor 2 NIURCA ZENAIDA CARR F/K/A NIURCA ZENAIDA WEHLER
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PennsylvaniaCase number 1:17-bk-00987-HWV

Form 4100R

Response to Notice of Final Cure Payment

12/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage InformationName of Creditor: Freedom Mortgage CorporationCourt claim no. (if known):
22Last 4 digits of any number you use to identify the debtor's account: 5415Property address: 203 Sunset Drive
Number Street
New Cumberland, PA 17070
City State ZIP Code**Part 2: Prepetition Default Payments**

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: _____
MM/DD/YYYY

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ 8,670.80
- b. Total fees, charges, expenses, escrow, and costs outstanding: +(b) \$ 0.00
- c. **Total.** Add lines a and b. (c) \$ 8,670.80

Creditor asserts that the debtor(s) are contractually
obligated for the postpetition payment(s) that first became
due on:03/01/2021
MM/DD/YYYY

Debtor1 DWAYNE LEE CARR
First Middle Last

Case number (if known) 1:17-bk-00987-HWV

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

/s/Mario Hanyon Date 10/14/2021
Signature

Print Mario Hanyon Title Attorney
First Name Middle Name Last Name

Company Brock & Scott, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 302 Fellowship Road, Ste 130
Number Street

Mount Laurel, NJ 08054
City State ZIP Code

Contact phone 844-856-6646 x4560 Email pabkr@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**
Harrisburg Division

IN RE:

DWAYNE LEE CARR and NIURCA ZENAIDA
CARR F/K/A NIURCA ZENAIDA WEHLER

Case No. 1:17-bk-00987-HWV

Chapter 13

Freedom Mortgage Corporation,

Movant

vs.

DWAYNE LEE CARR and NIURCA ZENAIDA
CARR F/K/A NIURCA ZENAIDA WEHLER,

Debtors

and

Jack N. Zaharopoulos, Trustee

Respondent

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Response To Notice Of Final Cure Payment has been electronically served or mailed, postage prepaid on October 14, 2021 to the following:

Service by First-Class mail:

DWAYNE LEE CARR

203 SUNSET DR

NEW CUMBERLAND, PA 17070

NIURCA ZENAIDA CARR F/K/A NIURCA ZENAIDA WEHLER

203 SUNSET DR

NEW CUMBERLAND, PA 17070

Service by Electronic means:

Kara Katherine Gendron, Debtors' Attorney

Mott & Gendron Law

125 State Street

Harrisburg, PA 17101

Dorothy L Mott, Debtors' Attorney

Mott & Gendron Law

125 State Street

Harrisburg, PA 17101

Jack N Zaharopoulos, Bankruptcy Trustee

8125 Adams Drive, Suite A

Hummelstown, PA 17036

Asst. U.S. Trustee, US Trustee

228 Walnut Street, Suite 1190

Harrisburg, PA 17101

/s/ Mario Hanyon

Mario Hanyon

(Bar No. 203993)

Attorney for Creditor

BROCK & SCOTT, PLLC

302 Fellowship Road, Ste 130

Mount Laurel, NJ 08054

Telephone: 844-856-6646 x4560

Facsimile: 704-369-0760

E-Mail: pabkr@brockandscott.com

Loan #:	
BK Case #:	1700987
Name:	Carr
BK Filed	3/13/2017

Date Received	Contractual Due Date	Post Petition Due Date	Pre	Payment Amount	Amount Due	Difference	Post Suspense	Fees
						\$ -	\$ -	
						\$ -	\$ -	
4/4/2017				\$ 1,057.00		\$ 1,057.00	\$ 1,057.00	
5/12/2017	9/1/2016			\$ 1,063.00	\$ 1,062.43	\$ 0.57	\$ 1,057.57	
6/30/2017	10/1/2016			\$ 1,070.00	\$ 1,062.43	\$ 7.57	\$ 1,065.14	
7/3/2017	11/1/2016				\$ 1,062.43	\$ (1,062.43)	\$ 2.71	
8/7/2017	NSF	Bounced		\$ 1,070.00	\$ 1,070.00	\$ -	\$ 2.71	
Loan modification with prior servicer					\$ 2.71	\$ (2.71)	\$ (0.00)	
10/27/2017	10/1/2017			\$ 1,172.00	\$ 1,125.98	\$ 46.02	\$ 46.02	
11/20/2017	11/1/2017			\$ 1,125.98	\$ 1,125.98	\$ -	\$ 46.02	
12/28/2017	12/1/2017			\$ 1,125.98	\$ 1,125.98	\$ -	\$ 46.02	
1/26/2018	1/1/2018			\$ 1,132.98	\$ 1,132.98	\$ -	\$ 46.02	
2/22/2018	2/1/2018			\$ 1,132.98	\$ 1,132.98	\$ -	\$ 46.02	
3/23/2018	3/1/2018			\$ 1,132.98	\$ 1,132.98	\$ -	\$ 46.02	
4/19/2018	4/1/2018			\$ 1,132.98	\$ 1,132.98	\$ -	\$ 46.02	
5/30/2018	5/1/2018			\$ 1,132.98	\$ 1,132.98	\$ -	\$ 46.02	
6/28/2018	6/1/2018			\$ 1,132.98	\$ 1,132.98	\$ -	\$ 46.02	
7/25/2018	7/1/2018			\$ 1,132.98	\$ 1,132.98	\$ -	\$ 46.02	
9/5/2018	8/1/2018			\$ 1,133.00	\$ 1,132.98	\$ 0.02	\$ 46.04	
10/3/2018	9/1/2018			\$ 1,133.00	\$ 1,132.98	\$ 0.02	\$ 46.06	
11/1/2018	10/1/2018			\$ 1,133.00	\$ 1,132.98	\$ 0.02	\$ 46.08	
12/17/2018	11/1/2018			\$ 1,133.00	\$ 1,132.98	\$ 0.02	\$ 46.10	
1/25/2019	12/1/2018			\$ 1,133.00	\$ 1,132.98	\$ 0.02	\$ 46.12	
3/1/2019	1/1/2019			\$ 1,133.00	\$ 1,132.98	\$ 0.02	\$ 46.14	
3/8/2019				\$ 1,133.00		\$ 1,133.00	\$ 1,179.14	
3/11/2019	2/1/2019				\$ 1,132.98	\$ (1,132.98)	\$ 46.16	
3/25/2019	3/1/2019			\$ 1,145.00	\$ 1,132.98	\$ 12.02	\$ 58.18	
5/3/2019	4/1/2019			\$ 1,145.00	\$ 1,132.98	\$ 12.02	\$ 70.20	
5/16/2019	5/1/2019			\$ 1,145.00	\$ 1,132.98	\$ 12.02	\$ 82.22	

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